

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMAZON.COM, INC. *et al.*,

Defendants.

No. 2:23-cv-0932-JHC

**DECLARATION OF DR. RONALD
WILCOX IN SUPPORT OF
AMAZON'S OPPOSITION TO
FTC'S MOTION TO EXCLUDE HIS
EXPERT TESTIMONY**

DECLARATION OF RONALD WILCOX ISO AMAZON'S
OPPOSITION TO FTC'S MOTION TO EXCLUDE
HIS EXPERT TESTIMONY
(2:23-cv-0932-JHC) - 1

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

DECLARATION

I, Ronald T. Wilcox, declare as follows:

1. I am the NewMarket Corporation Professor of Business Administration at the Darden Graduate School of Business Administration, University of Virginia, where I conduct research and teach classes related to marketing, and where I was the Senior Associate Dean for Degree Programs.

2. Amazon.com, Inc. (“Amazon”) submitted my opening expert report on February 24, 2025 and my rebuttal expert report on April 23, 2025.

3. I submit this declaration in support of Amazon’s Opposition to the FTC’s Motion to Exclude my expert testimony.

4. The exhibits attached hereto comport with the Court’s Local Civil Rule 10(e)(10).

5. I understand the FTC has submitted a declaration by Adam Rottner, a Senior Investigator in the Division of Enforcement, Bureau of Consumer Protection, where he describes the steps he took to create an online member profile for an account on Rewards for Opinions, a division of the Dynata company Research Now Group, LLC. Dkt. 311, Rottner ¶¶ 3-7. He states that he was required to answer 103 pages of questions to complete a profile. *Id.* ¶ 13.

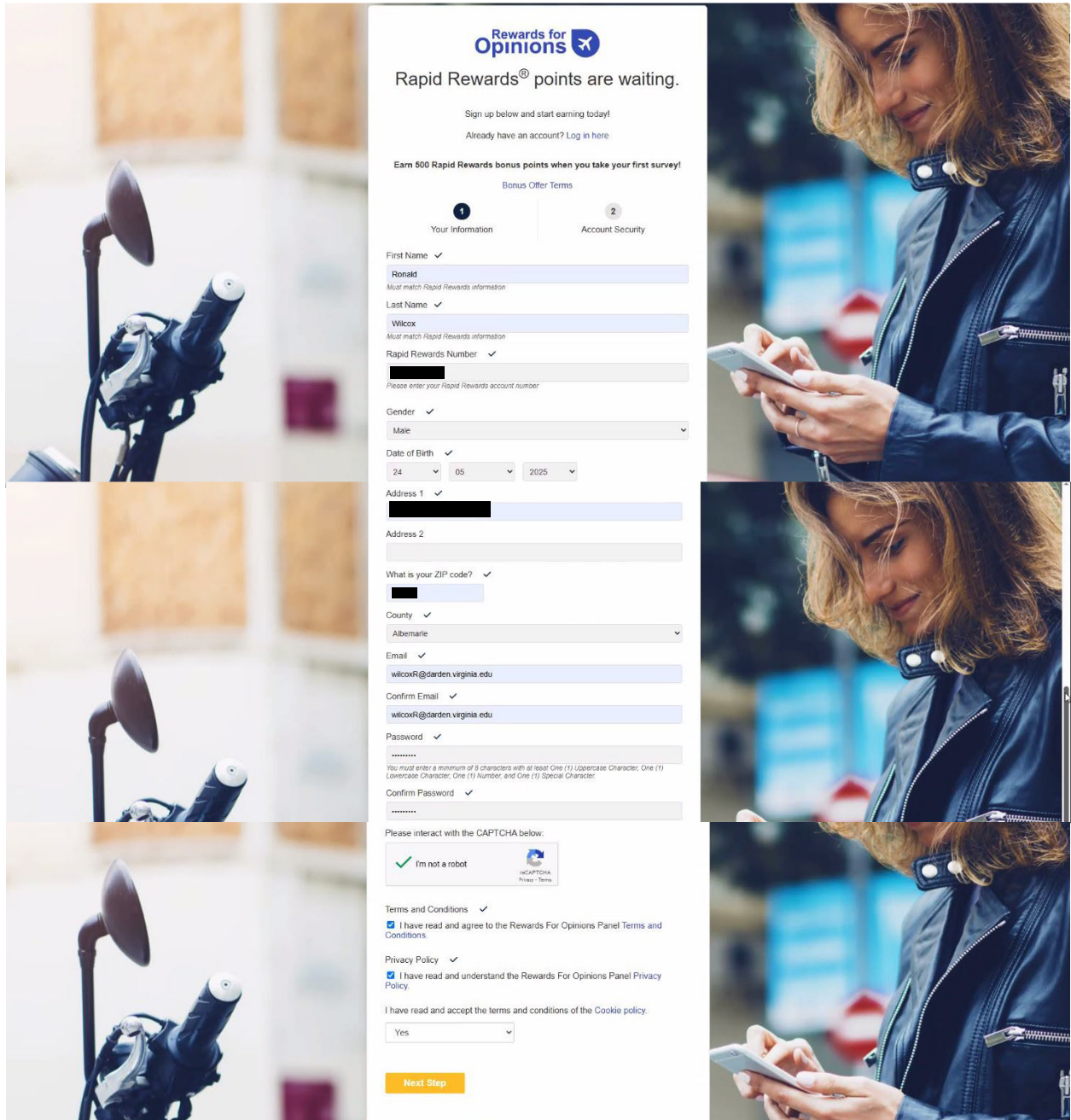
6. On June 16, 2025, I visited the Rewards for Opinions webpage to create a profile for myself and to start a survey. What I found was that I only needed to complete 7% of my profile—which was just one page—in order to participate in a survey on the Rewards for Opinions website. Below are the steps I took to create my profile on Rewards for Opinions and to start a survey.

7. First, I went on the Rewards for Opinions website, www.rewardsforopinions.com/, and created my account under my name. On that page, I was required to enter my name, age, gender, address, Southwest Rapid Rewards number, and password. I also selected two Terms and Conditions boxes, agreed to accept the terms and conditions of the Cookie policy, and completed a CAPTCHA to verify that I was not a robot. **Attachment 1** is a true and correct copy of the account creation page that I filled out, with my address and Rapid Rewards Number redacted.

DECLARATION OF RONALD WILCOX ISO AMAZON’S
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Below are accurate screenshots.



The central screenshot shows the 'Rewards for Opinions' account creation page. The header reads 'Rapid Rewards® points are waiting.' and 'Sign up below and start earning today!'. Below this is a link 'Already have an account? Log in here'. A banner states 'Earn 500 Rapid Rewards bonus points when you take your first survey!' with a link to 'Bonus Offer Terms'. The form is divided into two steps: '1 Your Information' and '2 Account Security'. The 'Your Information' step includes fields for First Name (Ronald), Last Name (Wilcox), Rapid Rewards Number (redacted), Gender (Male), Date of Birth (24/05/2025), Address 1 (redacted), Address 2 (redacted), ZIP code (redacted), County (Albemarle), Email (wilcoxR@darden.virginia.edu), Confirm Email (wilcoxR@darden.virginia.edu), Password (redacted), and Confirm Password (redacted). A CAPTCHA section asks the user to interact with a CAPTCHA below, showing a green checkmark and 'I'm not a robot'. At the bottom, there are checkboxes for 'Terms and Conditions' and 'Privacy Policy', both of which are checked. A dropdown menu for 'I have read and accept the terms and conditions of the Cookie policy.' is set to 'Yes'. A yellow 'Next Step' button is at the bottom right.

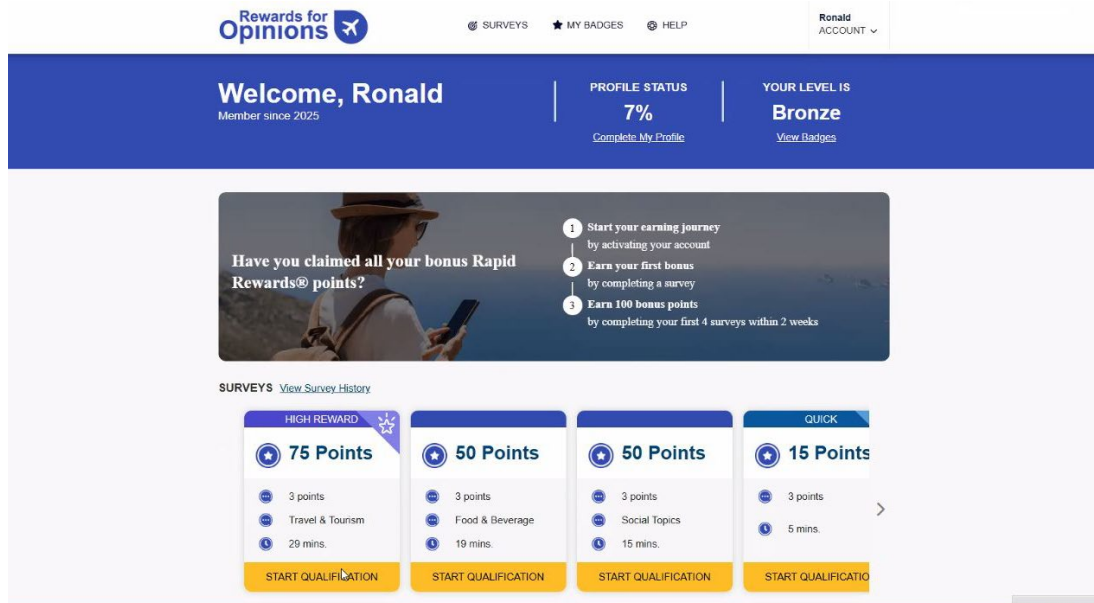
8. Second, I clicked a “Next Steps” button on the account creation page, and was asked to set up a security question and activate my account.

9. Third, after I activated my account, I logged back on to the Rewards for Opinions website. At the top of the landing page, I saw a “Welcome” banner which indicated that my

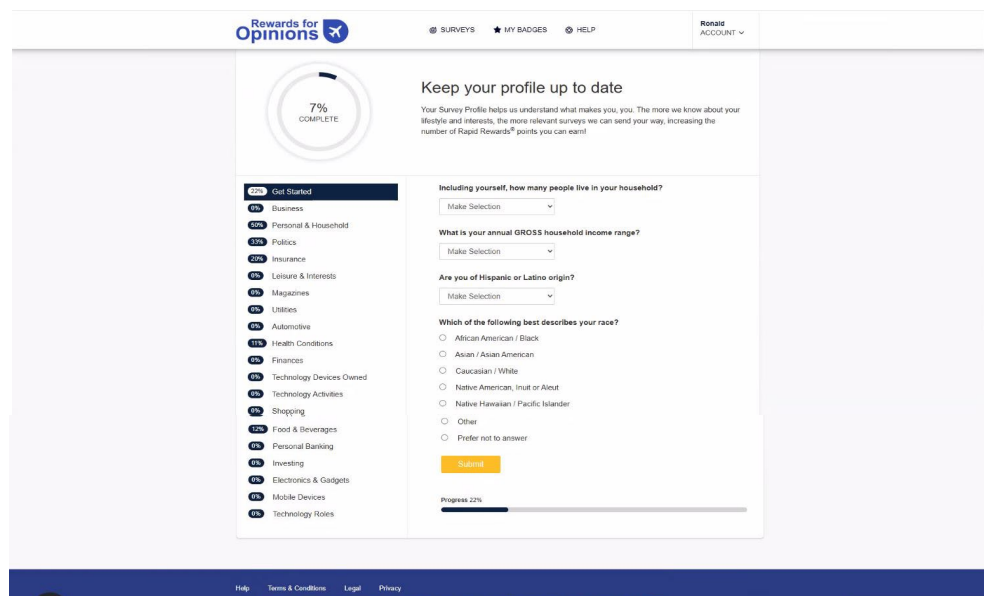
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“Profile Status” was 7% completed. That same page displayed a selection of surveys that I could complete in exchange for reward points. **Attachment 2** is a true and correct copy of the landing page that I saw after I logged into the Rewards for Opinions website. Below is an accurate screenshot.



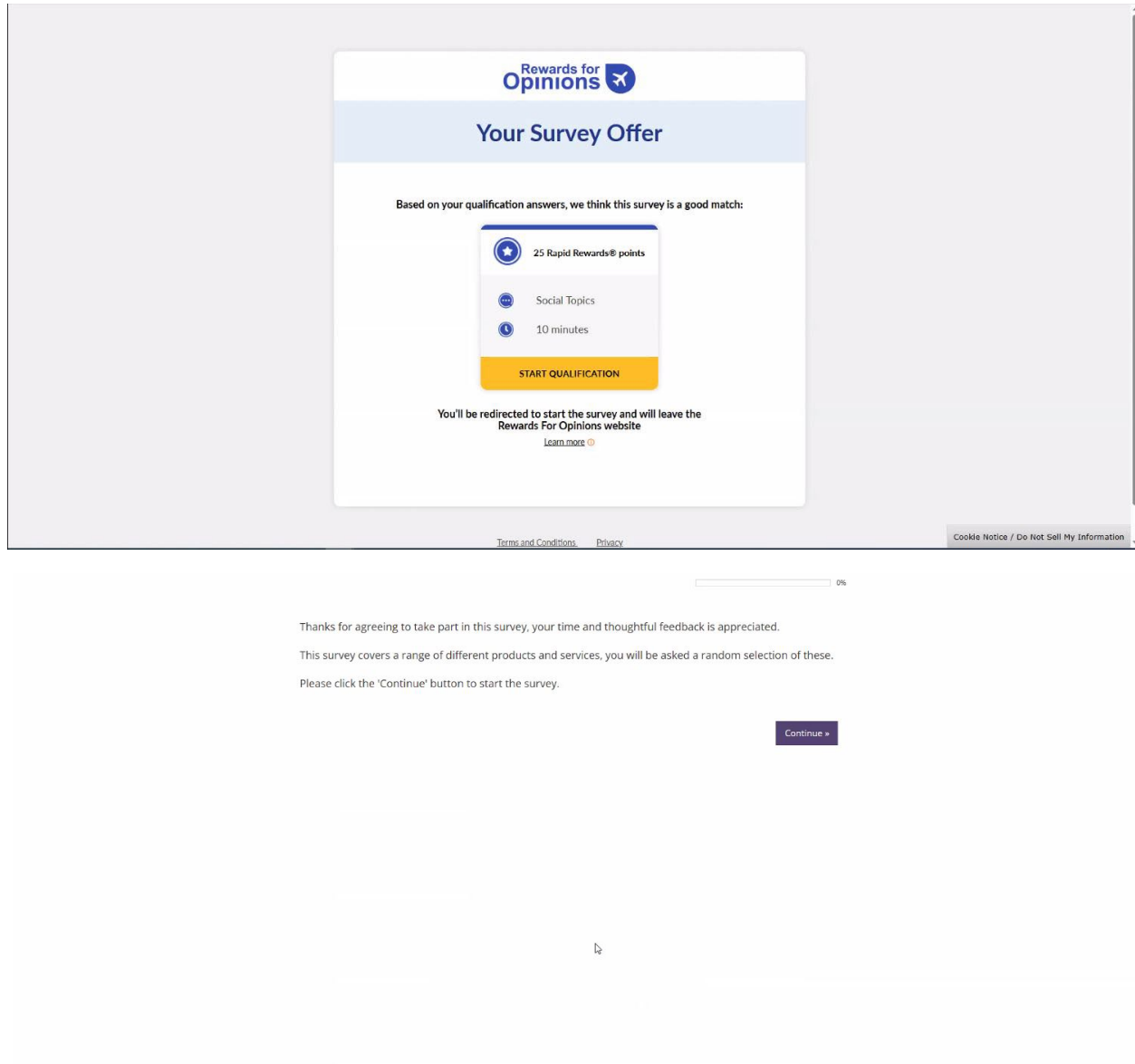
10. Fourth, I checked my profile status, and it indicated that none of the profile categories were complete. Most of the categories indicated that they were 0% filled out. My Personal & Household category had the highest completion rate, at 50%. **Attachment 3** is a true and correct copy of my survey profile completion page. Below is an accurate screenshot.



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11. Fifth, I started one of the surveys that I saw on the landing page. **Attachment 4** contains true and correct copies of the first few pages of the survey that I started on the Rewards for Opinions website. Below is an accurate screenshot.



First, a few questions about you...

Continue »

What is your age?

57

Continue »

Are you ...
Please select one only

☒ Male

☐ Female

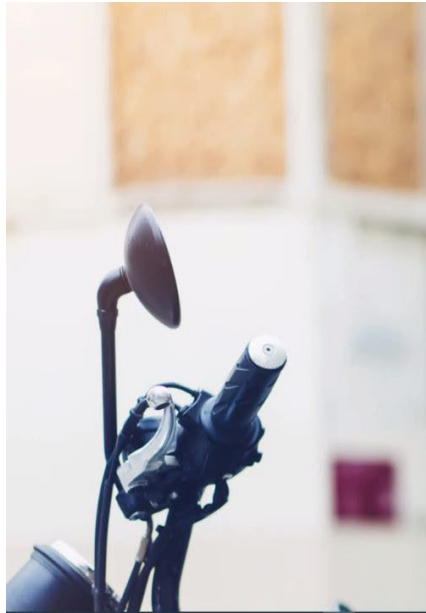

☐ Another gender (specify, if you'd like to)

Continue »

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Attachment 1



Rewards for Opinions

Rapid Rewards® points are waiting.

Sign up below and start earning today!
Already have an account? [Log in here](#)

Earn 500 Rapid Rewards bonus points when you take your first survey!
Bonus Offer Terms

1 Your Information **2** Account Security

First Name ✓
Ronald
Must match Rapid Rewards information

Last Name ✓
Wicox
Must match Rapid Rewards information

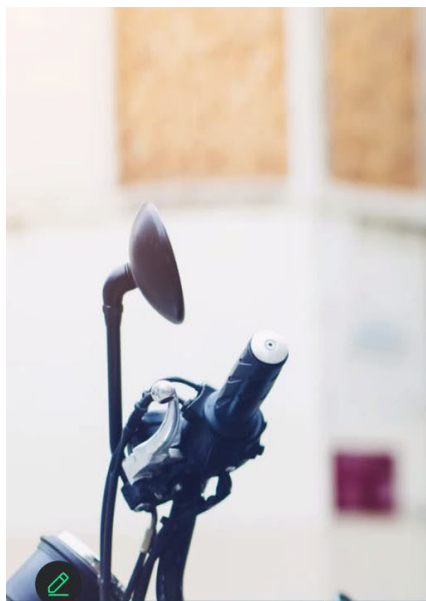
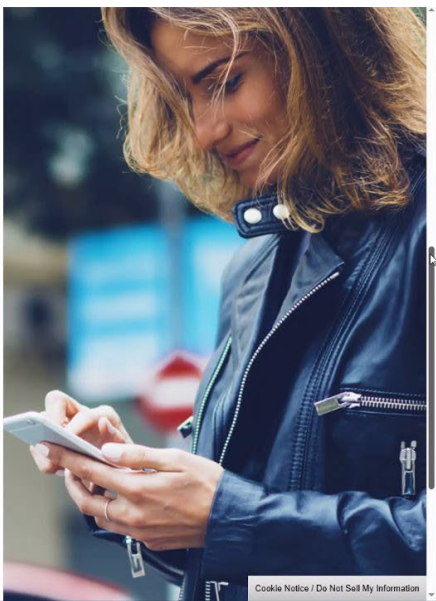
Rapid Rewards Number ✓
[Redacted]
Please enter your Rapid Rewards account number

Gender ✓
Male

Date of Birth ✓
24 / 05 / 2025

Address 1 ✓

[Cookie Notice](#) / [Do Not Sell My Information](#)



Address 1 ✓
[Redacted]

Address 2
[Redacted]

What is your ZIP code? ✓
[Redacted]

County ✓
Albemarle

Email ✓
wicoxR@darden.virginia.edu

Confirm Email ✓
wicoxR@darden.virginia.edu

Password ✓
[Redacted]
You must enter a minimum of 8 characters with at least One (1) Uppercase Character, One (1) Lowercase Character, One (1) Number, and One (1) Special Character.

Confirm Password ✓
[Redacted]



Please interact with the CAPTCHA below.

☒ I'm not a robot

Terms and Conditions ✓
☒ I have read and agree to the Rewards For Opinions Panel Terms and Conditions.

Privacy Policy ✓
☒ I have read and understand the Rewards For Opinions Panel Privacy Policy.

[Cookie Notice](#) / [Do Not Sell My Information](#)



Confirm Email ✓
wilcoxR@garden.virginia.edu

Password ✓

You must enter a minimum of 8 characters with at least One (1) Uppercase Character, One (1) Lowercase Character, One (1) Number, and One (1) Special Character.

Confirm Password ✓

Please interact with the CAPTCHA below:

✓ I'm not a robot

hCAPTCHA
Privacy · Terms

Terms and Conditions ✓
☒ I have read and agree to the Rewards For Opinions Panel Terms and Conditions.

Privacy Policy ✓
☒ I have read and understand the Rewards For Opinions Panel Privacy Policy.

I have read and accept the terms and conditions of the Cookie policy:
Yes


Next Step

Help Terms & Conditions Legal Privacy


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Cookie Notice / Do Not Sell My Information

Attachment 2




[SURVEYS](#) [★ MY BADGES](#) [? HELP](#)

Ronald
ACCOUNT 

Welcome, Ronald
Member since 2025

PROFILE STATUS
7%
[Complete My Profile](#)


YOUR LEVEL IS
Bronze
[View Badges](#)





Have you claimed all your bonus Rapid Rewards® points?


- 1 Start your earning journey by activating your account
- 2 Earn your first bonus by completing a survey
- 3 Earn 100 bonus points by completing your first 4 surveys within 2 weeks


SURVEYS [View Survey History](#)

HIGH REWARD 


 75 Points


 3 points


 Travel & Tourism


 29 mins.

START QUALIFICATION


 50 Points


 3 points


 Food & Beverage


 19 mins.

START QUALIFICATION

 50 Points


 3 points


 Social Topics


 15 mins.

START QUALIFICATION


QUICK

 15 Points

 3 points

 5 mins.

START QUALIFICATION



[Sign Up Now](#) [Log In](#) [Forgot Password](#)

Attachment 3

[SURVEYS](#)
[★ MY BADGES](#)
[HELP](#)

Ronald
ACCOUNT

Keep your profile up to date

Your Survey Profile helps us understand what makes you, you. The more we know about your lifestyle and interests, the more relevant surveys we can send your way, increasing the number of Rapid Rewards® points you can earn!

22% Get Started

0% Business

50% Personal & Household

33% Politics

20% Insurance

0% Leisure & Interests

0% Magazines

0% Utilities

0% Automotive

11% Health Conditions

0% Finances

0% Technology Devices Owned

0% Technology Activities

0% Shopping

12% Food & Beverages

0% Personal Banking

Including yourself, how many people live in your household?

Make Selection

What is your annual GROSS household income range?

Make Selection

Are you of Hispanic or Latino origin?

Make Selection

Which of the following best describes your race?

☐ African American / Black

☐ Asian / Asian American

☐ Caucasian / White

☐ Native American, Inuit or Aleut

☐ Native Hawaiian / Pacific Islander

☐ Other

☐ Prefer not to answer

[Cookie Notice / Do Not Sell My Information](#)

[SURVEYS](#)
[★ MY BADGES](#)
[HELP](#)

Ronald
ACCOUNT

50% Personal & Household

33% Politics

20% Insurance

0% Leisure & Interests

0% Magazines

0% Utilities

0% Automotive

11% Health Conditions

0% Finances

0% Technology Devices Owned

0% Technology Activities

0% Shopping

12% Food & Beverages

0% Personal Banking

0% Investing

0% Electronics & Gadgets

0% Mobile Devices

0% Technology Roles

What is your annual GROSS household income range?

Make Selection

Are you of Hispanic or Latino origin?

Make Selection

Which of the following best describes your race?

☐ African American / Black

☐ Asian / Asian American

☐ Caucasian / White

☐ Native American, Inuit or Aleut

☐ Native Hawaiian / Pacific Islander

☐ Other

☐ Prefer not to answer

Submit

Progress 22%

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Attachment 4

Rewards for
Opinions

Your Survey Offer

Based on your qualification answers, we think this survey is a good match:

25 Rapid Rewards® points

Social Topics

10 minutes

START QUALIFICATION

You'll be redirected to start the survey and will leave the
Rewards For Opinions website

[Learn more](#)

[Terms and Conditions](#)

[Privacy](#)

[Cookie Notice / Do Not Sell My Information](#)

0%

Thanks for agreeing to take part in this survey, your time and thoughtful feedback is appreciated.

This survey covers a range of different products and services, you will be asked a random selection of these.


Please click the 'Continue' button to start the survey.

Continue »

1%

First, a few questions about you...


Continue »



2%

What is your age?

Continue »



2%

Are you ...
Please select one only

☒ Male

☐ Female

☐ Another gender (specify, if you'd like to)

Continue »

